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November 22, 2000

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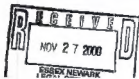
Re: Frank Hutchins and Essex Plaza Management Associates

Dear Mr. Torres:

I am in receipt of your letter, dated November 3, 2000, regarding your clinic's representation of Frank Hutchins. This letter responds to your letter, and provides further notice to Mr. Hutchins of what we believe constitutes tortious interference into our client's operations.

Initially, your client is advised that his appearance at the recent Newark Municipal Council meeting on the tax abatement for S.H.E. Urban Renewal, which operates Bruce Street Apartments, was totally inappropriate. S.H.E. Urban Renewal is a totally separate entity from Essex Plaza Management Associates where your client is purportedly seeking to organize the tenants. He has attempted to infect the proceeding of the Council based upon defamatory statements made about Essex Plaza Management Associates, which is a completely separate entity from S.H.E. Urban Renewal.

You are also advised that several tenants have complained to the management office that the tenant with whom your client has been affiliated, Stephan Botoe, is harassing certain tenants with regard to his involvement in what he has identified as the Essex Plaza One Tenants Association. Specifically, certain tenants have requested our intervention to advise Botoe that they do not wish to be contacted by him with regard to this association's activities. They have complained that he is interfering with their quiet enjoyment of the premises, and you should counsel your client about these matters to avoid further disruption at the premises.



Moreover, it appears that Botoe's association is not duly recognized by the tenants as their representative body. As he and your client are fully aware of, the Swinging Seniors tenant's association has been recognized and duly elected by the majority of the tenants at 1060 Broad Street for over 15-20 years. It also appears that there has been considerable misrepresentation over the number of tenants which are in support of Botoe's association. Many tenants have indicated that they believed they were ratifying the Swinging Seniors' tenants association when they received a document requesting them to vote for their support of a representative organization, but later learned this document was circulated by Botoe's association. These tenants clarified that they were supporting the Swinging Senior's tenants association and did not support Botoe's purported organization.

Our client, in accordance with its responsibilities to the other tenants residing at 1060 Broad Street, will not allow tenants or third parties to further disturb other tenants' right to quiet enjoyment of their units and the public areas within the premises. We consider this disruption as a breach of Botoe's lease.

You are also advised that contrary to allegations asserted by your client, Botoe has never been denied use of the community room, but rather, he has taken it upon himself to violate the rules and regulations of the use of the community room and in one case refused to allow the cleaning crew to work in the room during their regularly scheduled work hours from around 3:00pm to around 7pm. This conduct caused considerable inconvenience and expense to our client, and the cleaning staff, and violates the rules of the building governing the use of the community room. These rules were provided to your client in our prior correspondence to him.

I trust that you will counsel your client accordingly.

Very truly yours,

Linda Wong

File no. 09190016

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